



State of New Jersey  
Department of Environmental Protection and Energy  
Division of Responsible Party Site Remediation  
CN 028  
Trenton, NJ 08625-0028

Scott A. Weiner  
Commissioner

Karl J. Delaney  
Director

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
NO. P 642 608 936

07 OCT 1992

Cristopher Anderson  
Director of Environmental Affairs  
L. E. Carpenter & Company  
1301 East Ninth Street  
Suite 3600  
Cleveland, OH 44144

Re: L. E. Carpenter Site  
Wharton Borough, Morris County  
October 1, 1992 Meeting Minutes

Dear Mr. Anderson:

The following text is the New Jersey Department of Environmental Protection and Energy's (NJDEPE) interpretation of the meeting of October 1, 1992 with L.E. Carpenter, Roy F. Weston, Inc., and CN Communications.

*I. Community Relations Issues*

Tony Cicatiello, CN Communications, on behalf of L. E. Carpenter, met with representatives of Wharton Borough on September 30, 1992. The meeting addressed the Washington Forge Pond Dam and the appearance of the building located on Main Street among other relevant issues. Wharton Borough expressed appreciation for revamping the building's appearances. L. E. Carpenter agreed to participate jointly with the Borough to assess the Dam's integrity.

L. E. Carpenter is considering signing a MOA for the Dewey Avenue and Baker Avenue Satellite Sites. Mr. Anderson stated that a sampling plan is being completed for the Dewey Avenue Site and the Baker Avenue site is still under investigation.

L. E. Carpenter also expressed interest in allowing portions of the site (specifically Block 703, Lot 30 and the building abutting the contaminated area) to be excluded from the Record of Decision or be determined as having a "No Action" alternative because previous



sampling has indicated no contamination. The Department needs to review the data and decide if enough information has been gathered to warrant a no action alternative decision pursuant to the NCP.

George Tomaccio, Bureau of Community Relations, NJDEPE discussed the Department's policies regarding community relations and working with outside vendors which are hired by potential responsible party for community relations work.

## II. *Final Supplemental Remedial Investigation Report*

L. E. Carpenter is presently preparing the application for a Letter of Interpretation for the Department's approval of the Wetlands Survey. The application will be sent to Ms. Purcell who will forward the application to Land Use Regulation Element, NJDEPE.

USEPA statements regarding the Flood Plain Assessment will be clarified and forwarded by the Department.

The Department has found inconsistencies in the monitor well elevations levels tables in the Final Supplemental RI and will communicate them to WESTON in a conference call the week of October 5, 1992. Martin O'Neill, WESTON, requested that all comments from the Department be communicated directly to him and not to other members of the WESTON case team.

## III. *Treatability Study Report*

L. E. Carpenter stated that a revised version of the Treatability Study is not necessary because the Department's comments do not impact the conclusions of the Report. The Treatability Study was performed as part of the FS and will be part of the Administrative Record together with the NJDEPE and USEPA comments attached. Therefore, L. E. Carpenter will be sending a copy of the Report to the USEPA for their review.

## IV. *Feasibility Study*

The Department's comments on the Feasibility Study were responded to by WESTON. Both comments were reviewed and discussed. The Department accepted most of WESTON's responses except the following:

### Comment IV.

The comment discussed L. E. Carpenter developing a subsurface clean up number for antimony since the contaminant is found both in soils and groundwater. The discussion identified different methodologies such as a TCLP acid extraction leachability test, a leachability test simulating rain fall and natural conditions, and a

literature search. The Department understands that Weston will be proposing a methodology by the end of the month.

Comment VI. A and B

WESTON, on behalf of L. E. Carpenter, does not agree with the Department's contention that groundwater remediation for antimony is necessary for this site. WESTON presented flow weighted calculations for inorganics in water which indicate extracted groundwater concentration below the proposed clean up standards. However, there is no guarantee that influent limits will meet this criteria at this time and the Department is firm in its decision that remedial alternatives for inorganics (specifically Antimony) in groundwater are required to be addressed in the Feasibility Study.

Comment XV.

In a letter dated May 19, 1992 L. E. Carpenter proposed to use the proposed clean up standards as the remediation goals for the site, which the Department agreed. Therefore, removal of contaminants to subsurface clean up numbers when such contaminants are found in groundwater should not have to be explained. Subsurface standards were developed to protect groundwater from being recontaminated after remediation has ended.

Comment XXIV.

The Department did not understand WESTON's response to comment XXIV and asked for it to be explained. WESTON explained that some areas of contaminated soil will be consolidated so remediation will remain in a localized area. This approach as explained is acceptable to the Department.

B. USEPA comments letter dated September 21, 1992

Most comments made by USEPA were accepted by L. E. Carpenter. As stated above, the comment regarding the Flood Plain Assessment needs to be clarified by the Department. Also, USEPA's comment regarding the previous hit of bis 2 ethyl hexyl phthalate (DEHP) in the ground water caused some concern. The Department recommended additional sampling of MW-11d to confirm the existence or non-existence of contamination. Therefore, WESTON will review past data and attempt to explain the existence of DEHP in the deep well. If the Department does not accept its explanation, sampling of MW-11d will occur in during the next round of quarterly sampling (December 1992).

C. Revised Deadline

The Department does not understand why it is necessary to complete aquifer zone slug tests before the FS is revised. The aquifer parameters which would be acquired would not be

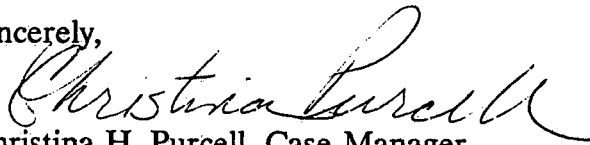
used until the design of the ground water treatment system. However, the Department agreed to an extended deadline if WESTON submits a revised FS to the Department on or before October 30, 1992 void of the slug test calculations. Five copies of the completed and revised FS is due November 17, 1992.

#### D. Interim Remedial Actions

WESTON, on behalf of L. E. Carpenter, suggested implementing two interim remedial actions, specifically for the disposal area and the passive groundwater immiscible system. Both actions would require a work plan which would need USEPA concurrence, Township approval, a notice to the community and other cumbersome steps as required under the NCP. Since a Record of Decision will be drafted and signed within the next 6 months, these actions will wait until all selected alternatives have been presented and accepted by the community.

Should you have any questions or additional comments, please feel free to call me at (609) 633-1455. Thank you for your continuing cooperation.

Sincerely,



Christina H. Purcell, Case Manager  
Bureau of Federal Case Management

cc: Martin O'Neill, Roy F. Weston  
Brian Magee, Roy F. Weston  
Richard Hahn, L. E. Carpenter  
Tony Cicatiello, CN Communications  
Jonathan Josephs, USEPA  
John Prendergast, BEERA  
George Blyskun, BGWPA  
George Tomaccio, BCR

**L. E. CARPENTER SITE  
WHARTON BOROUGH, MORRIS COUNTY**

**MEETING AGENDA  
OCTOBER 1, 1992**

- I. *Community Relations Issues*
  - a. Washington Forge Pond Dam - L. E. Carpenter Property? and/or responsibility?
  - b. Building Appearance
  - c. Satellite Sites
  - d. Open Discussion
- II. *Final Supplemental Remedial Investigation Report*
  - a. Wetlands Survey
  - b. Flood Plain Assessment
  - c. Monitor well elevation levels and Equipotential Maps
- III. *Treatability Study Report*
  - a. NJDEPE comments dated September 30, 1992
  - b. Open Discussion
- IV. *Final Feasibility Study*
  - a. NJDEPE comments letter dated September 9, 1992
  - b. USEPA comments letter dated September 21, 1992
    - i. sampling additional wells
  - c. Revised Deadline
  - d. Open discussion
- IV. *Closing Remarks*

L. E. Carpenter Site  
Meeting of October 1, 1992

Name	Organization	Phone #
JOHN PRENDERGAST	DEPE (TECHNICAL COORDINATOR)	609 984-3068
GEORGE TAMACCIO	DEPE (COMMUNITY RELATIONS)	609 904-3081
Anthony Cicatiello	CN Communications	908/382-1066
Christopher Anderson	L.E. Carpenter	216 589-4020
George Blyskun	NJ DEPE	609-292-8427
Martin ONeil	WESTON	908-225-3990
Brian Magee	Weston	215-344-3777
Richard Hahn	L.E. Carpenter	216-589-4040
JEFF GRACER	Lawenstein, Sandler	201-992-8700
Christina Purcell	NJ DEPE - Case Manager	609-633-1455